

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3:23-cv-01092

Chief Judge Waverly D. Crenshaw, Jr.  
Magistrate Judge Alistair Newbern

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c) and Local Rule 37.01, Plaintiffs Concord Music Group, Inc., Capitol CMG, Inc., Universal Music Corp., Songs of Universal, Inc., Universal Music – MGB NA LLC, Polygram Publishing, Inc., Universal Music – Z Tunes LLC, and ABKCO Music, Inc. (collectively, “Plaintiffs”) and Defendant Anthropic PBC (“Anthropic”), by and through their respective counsel, respectfully move for entry of the attached proposed Stipulated Protective Order. The parties have agreed to the language and content of the proposed Stipulated Protective Order and believe its entry is necessary for purposes of facilitating discovery while protecting certain information and documents that may be produced during the discovery process that the parties believe in good faith are sensitive, confidential, proprietary, and/or personal. However, Anthropic does not consent to jurisdiction or proper venue in the United States District Court for the Middle District of Tennessee by virtue of entering into this stipulated protective order with Plaintiffs and does not waive, and expressly reserves, its rights to have this case dismissed, or in the alternative transferred, per Anthropic’s pending motion to dismiss. *See* ECF No. 54. Plaintiffs and Defendant respectfully request that the Court enter the proposed Stipulated

Protective Order at its earliest convenience in light of pending discovery requests related to Plaintiffs' Motion for Preliminary Injunction. *See* ECF No. 40.

Dated: January 4, 2024

/s/ Aubrey B. Harwell III

Aubrey B. Harwell III (No. 017394)  
Nathan C. Sanders (No. 33520)  
Olivia R. Arboneaux (No. 40225)  
NEAL & HARWELL, PLC  
1201 Demonbreun Street, Suite 1000  
Nashville, TN 37203  
Telephone: 615.244.1713  
tharwell@nealharwell.com  
nsanders@nealharwell.com  
oarbhoneaux@nealharwell.com

Joseph R. Wetzel  
Andrew M. Gass  
(admitted *pro hac vice*)  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
Telephone: 415.391.0600  
joe.wetzel@lw.com  
andrew.gass@lw.com

Allison L. Stillman  
(admitted *pro hac vice*)  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, NY 10020  
Telephone: 212.751.4864  
alli.stillman@lw.com

Sarang V. Damle  
(admitted *pro hac vice*)  
LATHAM & WATKINS LLP  
555 Eleventh Street, NW, Suite 1000  
Washington, D.C. 20004  
Telephone: 202.637.2200  
sy.damle@lw.com

*Attorneys for Defendant*

Respectfully submitted,

/s/ Steven A. Riley

Steven A. Riley (No. 6258)  
Tim Harvey (No. 21509)  
RILEY & JACOBSON, PLC  
1906 West End Avenue  
Nashville, TN 37203  
Telephone: (615) 320-3700  
sriley@rjfirm.com  
tharvey@rjfirm.com

Matthew J. Oppenheim  
Nicholas C. Hailey  
Audrey L. Adu-Appiah  
(admitted *pro hac vice*)  
OPPENHEIM + ZEBRAK, LLP  
4530 Wisconsin Ave., NW, 5th Floor  
Washington, DC 20016  
Telephone: (202) 480-2999  
matt@oandzlaw.com  
nick@oandzlaw.com  
aadu-appiah@oandzlaw.com

Jennifer Pariser  
Andrew Guerra  
Timothy Chung  
(admitted *pro hac vice*)  
OPPENHEIM + ZEBRAK, LLP  
461 5th Avenue, 19th Floor  
New York, NY 10017  
Telephone: (212) 951-1156  
jpariser@oandzlaw.com  
andrew@oandzlaw.com  
tchung@oandzlaw.com

Richard S. Mandel  
Jonathan Z. King  
Richard Dannay  
(admitted *pro hac vice*)  
COWAN, LIEBOWITZ & LATMAN, P.C.  
114 West 47th Street

New York, NY 10036-1525  
Telephone: (212) 790-9200  
rsm@cfl.com  
jzk@cfl.com  
rxd@cfl.com

*Attorneys for Plaintiffs*

### CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2024, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Aubrey B. Harwell III (No. 017394)  
Nathan C. Sanders (No. 33520)  
Olivia R. Arboneaux (No. 40225)  
NEAL & HARWELL, PLC  
1201 Demonbreun Street, Suite 1000  
Nashville, TN 37203  
tharwell@nealharwell.com  
nsanders@nealharwell.com  
oarbhoneaux@nealharwell.com

Allison L. Stillman  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, NY 10020  
alli.stillman@lw.com

Joseph R. Wetzel  
Andrew M. Gass  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
joe.wetzel@lw.com  
andrew.gass@lw.com

Sarang V. Damle  
LATHAM & WATKINS LLP  
555 Eleventh Street, NW, Suite 1000  
Washington, DC 20004  
sy.damle@lw.com

/s/ Steven A. Riley  
Steven A. Riley